

NOV 3 1998

**SUMMARY OF SAFETY AND EFFECTIVENESS  
Innova Small Vaginal and Rectal Stimulation Electrode**

Date of Summary: September 11, 1998

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*Empi, Inc.  
599 Cardigan Road  
St. Paul, Minnesota  
55126-4099 USA**612-415-9000  
FAX 612-415-7305***A. General Provisions**

Submitter's Name: Empi, Inc.  
Submitter's Address: 599 Cardigan Road  
 St. Paul, Minnesota 55126-3965  
Contact Person: Carolyn M. Steele Husten  
 Regulatory Affairs Manager  
Classification Name: Non-Implanted Electrical Continence Device  
 21 CFR Part 876.5320  
Proprietary Name: Innova® Small Vaginal and Rectal Stimulation  
 Electrode  
Common Name: Pelvic Floor Stimulation Device

**B. Name of Predicate Devices**

- Empi, Inc. Innova Rectal or Small Vaginal EMG Sensing Electrode K952688
- Empi, Inc. Innova Rectal Stimulation Electrode K954272
- Innova® ComfortPulse™ Vaginal Electrodes (Small and Std.) K964577
- Innova® Vaginal Electrode K940091

**C. Device Description**

The Small Vaginal and Rectal Stimulation Electrode is identical in design to the predicate rectal electrode device except for the addition of vaginal use for stimulation. There were no design changes required or made to allow for this change.

**D. Intended Use**

The electrode is indicated for pelvic floor stimulation use in the treatment of urinary incontinence and monitors and allows assessment of EMG activity of the pelvic floor muscles. The electrode can be used either vaginally and rectally; it should not be interchanged between the two positions. The electrode is reusable between patients if reuse instructions are followed.

**E. Non-Clinical and Clinical Test Summary**

A Clinical study was performed to establish equivalence between this electrode used vaginally and the currently marketed stimulation electrodes. This study confirmed the suitability of performance of this electrode.



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Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850Ms. Carolyn M. Steele Husten  
Regulatory Affairs Manager  
Empi, Incorporated  
599 Cardigan Road  
St. Paul, Minnesota 55126-4099Re: K983206  
Empi Small Vaginal and Rectal Stimulation Electrode  
Dated: September 11, 1998  
Received: September 14, 1998  
Regulatory Class: II  
21 CFR §876.5320/Product Code: 78 KPI

Dear Ms. Steele Husten:

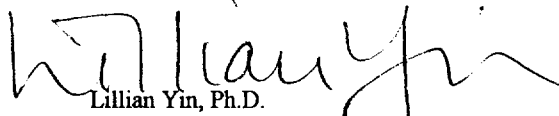
We have reviewed your Section 510(k) notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (Premarket Approval), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 895. A substantially equivalent determination assumes compliance with the Current Good Manufacturing Practice requirements, as set forth in the Quality System Regulation (QS) for Medical Devices: General regulation (21 CFR Part 820) and that, through periodic QS inspections, the Food and Drug Administration (FDA) will verify such assumptions. Failure to comply with the GMP regulation may result in regulatory action. In addition, FDA may publish further announcements concerning your device in the Federal Register. Please note: this response to your premarket notification submission does not affect any obligation you might have under sections 531 through 542 of the Act for devices under the Electronic Product Radiation Control provisions, or other Federal laws or regulations.

This letter will allow you to begin marketing your device as described in your 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4613. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address "<http://www.fda.gov/cdrh/dsma/dsmamain.html>".

Sincerely yours,



Lillian Yin, Ph.D.  
Director, Division of Reproductive,  
Abdominal, Ear, Nose and Throat  
and Radiological Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

**510(k) Number: (if known):** Unknown at time of submission

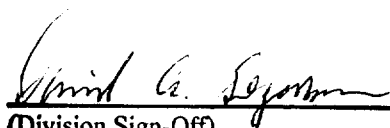
**Device Name:** Small Vaginal and Rectal Electrode

**Indications for Use:**

The electrode is indicated for pelvic floor stimulation use in the treatment of urinary incontinence and monitors and allows assessment of EMG activity of the pelvic floor muscles. The electrode can be used either vaginally and rectally; it should not be interchanged between the two positions. The electrode is reusable between patients if reuse instructions are followed.

PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER PAGE IF NEEDED)

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Concurrence of CDRH, Office of Device Evaluation (ODE)

  
\_\_\_\_\_  
(Division Sign-Off)  
Division of Reproductive, Abdominal, ENT,  
and Radiological Devices  
510(k) Number K983206

Prescription Use ☒  
(Per 21 CFR 801.109)

OR Over-The Counter Use \_\_\_\_\_